

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN
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Attorney for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JAMES S. PAVLICHKO, SR.,	:	Civil Action No. 02-CV-2889
As guardian ad litem for a Minor Child,	:	
JAMES S. PAVLICHKO, JR.	:	
VS.	:	
GLEN MILLS SCHOOL,	:	JURY OF 12 DEMANDED
COSIMO D. FERRAINOLA, DIRECTOR,	:	
LARRY LAURENCE, COUNSELOR,	:	
GREG FRAZIER, STAFF MEMBER,	:	
JIM WELSH, STAFF MEMBER,	:	
TODD DONAHUE, STAFF MEMBER,	:	
T.J. GREEN, STAFF MEMBER,	:	
MR. YANEZ, STAFF MEMBER	:	

DEFENDANTS' PROPOSED VOIR DIRE

1. The Plaintiff in this case is represented Kathleen Laubenstein and Matthew Hamermesh of Hangley, Aronchick, Segal & Pudlin and Defendants are being represented by Edward M. Galang, Esquire of Marshall, Dennehey, Warner, Coleman & Goggin and Guy Vilim of Gold and Vilim. Do you know either these attorneys?

2. This case arises from incidents that occurred while James Pavlichko, Jr. was placed in a juvenile facility at Glen Mills Schools. Would that fact alone prevent you from serving as a fair and impartial juror?

3. Are you or any member of your immediate family employed in an occupation dealing with the juvenile justice system or law enforcement? Would that employment affect your ability to serve as a fair and impartial juror?

4. Do you know James Pavlichko, Jr.?

5. Do you know Thomas Green?
6. Do you know James Welsh?
7. Do you know Nelson Yanez?
8. Do you know anyone employed or associated with Glen Mills Schools?
9. Have you or any members of your immediate family made a claim against a law enforcement or employee of a juvenile facility?
10. If the answer to the proceeding question is yes, please indicate the circumstances surrounding the incident and whether that fact would prevent you from serving as a fair and impartial juror in this case.
11. Does any member of the jury panel believe that simply because the Plaintiff has instituted an action, the Plaintiff is automatically entitled to receive compensation from the Defendant?
12. Has any member of the jury panel has such an unsatisfactory experience or relationship with the juvenile justice system so as to render him or her incapable of serving as a fair and impartial jury in this case?
13. Do you for any reason resent the juvenile justice system and its employees in general? If so, would this fact alone prevent you from being a fair and impartial juror in this case?
14. Members of the juror is there any reason why any of you feel that you could not serve as a fair and impartial juror in this case?

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

EDWARD M. GALANG, ESQUIRE
Attorney for Defendants

Dated: _____